

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

PETER M. GALLIGAN,

PLAINTIFF

V.

**ADTALEM GLOBAL EDUCATION INC. F/K/A
DEVRY EDUCATION GROUP; ADTALEM
GLOBAL HEALTH, INC. F/K/A DEVRY
MEDICAL INTERNATIONAL, INC.; ROSS
UNIVERSITY SCHOOL OF MEDICINE
SCHOOL OF VETERINARY MEDICINE (ST.
KITTS) LIMITED; AND DOES 1 THROUGH
50,**

DEFENDANTS

§

CIVIL CASE No. 1:17-cv-06310

JURY TRIAL DEMANDED

**PLAINTIFF'S MOTION FOR LEAVE
TO EXCEED THE PAGE LIMIT FOR THE RESPONSE TO DEFENDANTS'
MOTION TO DISMISS THE SECOND AMENDED COMPLAINT**

Plaintiff Peter M. Galligan (“Plaintiff”) files this Motion for Leave to Exceed the Page Limit for the Response to Defendants’ Motion to Dismiss the Second Amended Complaint, pursuant to Local Rule 7.1, because the nature of Defendants’ motion to dismiss and the number of claims at issue require briefing in excess of 15 pages. Currently, the deadline for Plaintiff to file a response to the motion to dismiss is Friday, May 4, 2018.

Defendants' Motion to Dismiss the Second Amended Complaint [Dkts. 33-35] seeks the dismissal of all of Plaintiff's claims in this proceeding. Plaintiff's claims center on the failure by Defendants Adtalem Global Education Inc. f/k/a DeVry Education Group, Adtalem Global Health, Inc. f/k/a DeVry Medical International, Inc., and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited

(collectively, “Defendants”)¹ to appropriately accommodate his documented learning disabilities, which Plaintiff alleges constituted violations of federal, state, and common law as well as Defendant’s own published policies and guidelines. To adequately respond to Defendants’ arguments, Plaintiff must demonstrate the validity of the legal bases for the nine claims at issue. Accordingly, Plaintiff respectfully requests leave to file a brief exceeding the 15-page limitation prescribed by this Court’s local rules, but in all events totaling 30 pages or less. Plaintiff does not make this request to burden the Court, but so that justice may be done.

¹ Plaintiff’s claims in this lawsuit are also asserted against Does 1 through 50, as defendants. However, for purposes of this motion, references to “Defendants” shall only include Adtalem Global Education Inc. f/k/a DeVry Education Group, Adtalem Global Health, Inc. f/k/a DeVry Medical International, Inc., and Ross University School of Medicine School of Veterinary Medicine (St. Kitts) Limited, all of whom are represented by the counsel listed in the Certificate of Service.

Dated this 30th day of April, 2018.

Respectfully submitted,

/s/ Michael W. Ford

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- and -

/s/ Emil T. Bayko

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CERTIFICATE OF CONFERENCE

I hereby certify that on April 27, 2018, my associate—Alison P. Henderson—emailed Defendants’ counsel regarding the requested relief and attached a draft of Plaintiff’s motion for leave. As of the date of filing of this motion, Defendants’ counsel has not responded indicating whether they are opposed or unopposed to the relief sought herein. In the event Defendants’ counsel responds to the email with their position regarding this motion and does not otherwise file a notice regarding their position, we will promptly advise the Court.

/s/ Emil T. Bayko

Emil T. Bayko

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2018, a true and correct copy of the foregoing pleading was electronically filed in accordance with the Federal Rules of Civil Procedure and was served via e-mail upon the following counsel of record:

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/s/ Emil T. Bayko

Emil T. Bayko